

To: Hence, Kia[hence.kia@epa.gov]
From: Nolan, Sean
Sent: Thur 7/20/2017 7:33:06 PM
Subject: RE: Exceptional Event Analyses Due Date

Kia,

Thanks for the response. I will probably call you at some point in the next couple of days regarding this (just for some added clarity).

In the meantime, I have an additional question. I did not see it mentioned below but I assume all of the work (whether that is by the end of this month or August or by May 31, 2018) is only in relation to 2016 and 2017 ozone data, correct? In other words, we cannot look back to 2015 even though the extension to May 31, 2018 was given with respect to 2017 DV data, correct?

Thanks in advance,

Sean

From: Hence, Kia [mailto:hence.kia@epa.gov]
Sent: Thursday, July 20, 2017 11:01 AM
To: Nolan, Sean <senolan@pa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Joerger, Verena <joerger.verena@epa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>
Subject: RE: Exceptional Event Analyses Due Date

Hi Sean,

Thanks for the notification. Headquarters (OAQPS) reminded us of a few points that should be considered:

- We do not know which data years will be used to calculate design values for 2015 ozone designations. EPA may use 2014-2016 or 2015-2017.

- We encourage PA to submit a final demonstration for any event having regulatory significance for 2015 ozone NAAQS design values using data years 2014-2016 by the previously agreed to deadlines in July and August 2017. The regulatory deadline for demonstration submission for these events was May 31, 2017.
- You are correct that EPA will accept exceptional events analyses that impact the 2017 3-year ozone design value period (i.e., 2015-2017 data) until May 31, 2018.
- States have up to 12 months to respond to EPA's request for additional evidence to support a demonstration. This means PADEP would have 12 months from the submittal date to submit a final EE demo for the Fort McMurray fire (see 40 CFR 50.14(c)(3)(vi). However, this rule would not apply to the July 2016 event since EPA didn't receive a demo by the 5/31/17 deadline. Therefore, *if* the EE has regulatory significance then the 2016 July demo is due by 5/31/2018 for the 2017 DV.

Specifically, for the Fort McMurray event PADEP has options to: (A) submit a complete package within 12 months (by 5/31/18) for the 2014-2016 DV Or (B) withdraw the package and submit a new EE demo for the 2015-2017 DV by 5/31/2018.

With this new info in mind please let me how you want to proceed on the EE package for Fort McMurray. Call or email me if you have questions.

Kia Long

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"We are what we repeatedly do. Excellence then, is not an act, but a habit." - Aristotle

From: Nolan, Sean [<mailto:senolan@pa.gov>]

Sent: Tuesday, July 18, 2017 5:59 PM

To: Hence, Kia <hence.kia@epa.gov>

Cc: Lazor, Nicholas <nlazor@pa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>

Subject: Exceptional Event Analyses Due Date

Kia,

As we discussed on the phone during the afternoon on Tuesday, July 18, I am proposing to delay the submittal of our exceptional event analyses for the May 2016 and July 2016 events until later this year / early next year. This proposal was centered on our discussion surrounding the recent delay in the ozone designation period with respect to the 2015 ozone NAAQS and additional guidance from EPA OAQPS regarding exceptional event analyses as they relate to the 2017 ozone design value period.

During our conversation, I stated it was my belief that in delaying the ozone designations for the 2015 ozone NAAQS until October 2018, EPA will continue to follow recent unwritten guidance and use the most recent 3-year period of ozone data for these designations. By October 2018 (or even the June 2018 120-day letter period), the 2017 ozone data will be available for use by EPA for these designations. It is my understanding that EPA OAQPS intends to accept exceptional event analyses that impact the 2017 3-year ozone design value period (at least for ozone data collected in 2016 and 2017) up until May 31, 2018.

Based on our preliminary assessment of 2017 ozone data, there are multiple additional areas that have the potential to be designated as nonattainment for the 2015 ozone NAAQS. This assessment, which was completed using data up through mid-July 2017, is incomplete as we still have the potential for daily 8-hour peak ozone concentrations (in excess of 70 parts per billion) through mid-September 2017. Having until May 31, 2018 would give us adequate time to assess the entire 2017 ozone season data to determine whether there still is a need for an exceptional event analysis. The following consideration will be placed on the data...

1. Will a concurrence of an exceptional event with the inclusion of 2017 ozone data impact potential designations for the 2015 ozone NAAQS
2. Specifically for the Philadelphia area, will a concurrence of an exceptional event with the inclusion of 2017 ozone data impact the potential classification (marginal vs. moderate) designation for the 2015 ozone NAAQS. The moderate threshold was proposed to start with a 3-year ozone design value of 81 ppb.

Let me know if you have any other specific questions regarding this request. I look forward to hearing back from you soon (also, please let me know if you disagree with my thought process here).

Best regards,

Sean

Sean P. Nolan | Chief, Quality Assurance and Data Assessment Section

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